

-----Original Message-----

From: [drupal\\_admin@epa.gov](mailto:drupal_admin@epa.gov) [[mailto:drupal\\_admin@epa.gov](mailto:drupal_admin@epa.gov)]

Sent: Tuesday, September 06, 2016 1:38 PM

To: HarborComments <[HarborComments@epa.gov](mailto:HarborComments@epa.gov)>

Subject: Harbor Comments

Submitted on 09/06/2016 4:38PM

Submitted values are:

Your Name: (b) (6)

Your Email: (b) (6)

Your Comments:

The Portland Harbor Superfund selected cleanup alternative falls FAR, far short of what is needed to restore safe, healthy conditions for people, water, soil, air, and wildlife and it is AN INSULT to we the people....we the taxpayers....and the next generations who will be left with a toxic, unremediated dumping ground in our beloved Willamette River.

Instead of aggressively remediating the site to achieve restoration and safe, healthy fish, water, soil, and air, the selected alternative will leave extensive long-term contamination in place by relying on the NO ACTION approach of "natural attenuation" of contaminants that are long-lived, do not degrade naturally in a reasonable timeframe, and will persist for the very long term. This is not "Cleanup" and it does not meet the superfund requirement to restore to conditions protective of people, the environment, and wildlife.

The polluters must pay the FULL price to RESTORE the Willamette River waters, sediments, air (including PCBs) and upland contaminated source areas to meet all applicable risk-based protective standards. A much much more aggressive dredging approach is needed, as are mechanisms to enforce compliance with restoration timelines and automatically trigger mandatory Additional Remedial Measures if those clearly delineated timelines are not on track or being achieved.

The cost estimate and financial commitment imposed on the Responsible Parties needs to be projected forward for 100 years, as it is the RPs' contamination that turned the previously safe and clean Willamette River into the toxic dumping site it currently is, and We The People and the State of Oregon should be protected from having to inherit an incompletely remediated, unrestored, long-term toxic, contaminated, site; the RP's need to pay the FULL price to restore this major waterway back to safe and protective contaminant levels for restored safe use and benefit of the river corridor.

Clean water is LIFE. The current plan to leave Willamette river contamination in place and to leave unsafe contaminant levels in environmental media within and adjacent to the river corridor are totally unacceptable.

The EPA has been completely unresponsive to the public input provided, and instead of strengthening the remedial alternatives from the prior draft, has reduced the remedial scope, withheld any timeline requirements and mandatory additional contingency actions to meet timeline requirements, does not meet risk-based protective contaminant level standards, and has reduced the cost estimate to the RPs,.....EPA is not fulfilling its legal and regulatory obligations with this wholly substandard selected alternative....which will leave us unable to safely eat fish from the river and unable to enjoy and rely on the health and safety of the Willamette River waters, sediments, air, and upland contaminated source properties.

Much, much more aggressive dredging is needed for the removal of these long-lived toxic chemicals from the Willamette River corridor; RP cost estimates are grossly underestimated; cleanup performance standards need to meet all applicable risk-based numerical standards and need to be enforceable and automatically linked to specific timelines for achieving those performance-based standards, with automatically required additional contingency remedial actions to be implemented if the mandated and legally binding cleanup milestones and standards are not achieved.

The Selected Alternative is WHOLLY inadequate! The public needs an extension to allow thoughtful public planning and a much more Responsive stance from the EPA to our community expectations and needs. We need a plan that will actually RESTORE the Willamette River corridor on a firm timeline with clear penalties to the RPs for non-compliance with protective numerical cleanup standards and timeline requirements. WE NEED RESTORATION,.....not just Kicking the Can Down the Road so the Responsible Parties can minimize their obligations and costs,....and instead, shift the toxic burden and cost to the PUBLIC, as they and the EPA plan to leave We the People, the waterway, the wildlife, and future generations with a toxic, unrestored river system.

Shame of you, EPA.

Sincerely, (b) (6)  
Portland, Oregon 97239